

Appeal reference: APP/D0121/W/24/334314
North Somerset Council reference: 23/P/0664/OUT
Land at Rectory Farm (North), Chescombe Road, Yatton

Sir - Yatton has taken - is taking - a lot of development.

Since 2016 the village has seen permission granted for **633** new dwellings by virtue of 7 separate planning applications¹ - some allocated sites; others not; and two allowed at appeal.

Following the new Government's announcements on planning reforms and the proposed revisions to the NPPF I accept that more work needs to be done by the council and further allocations will need to be made.

Indeed, an approval decision is pending for a further 87 dwellings on the current site of Yatton rugby club; another appeal has just been registered on a further site for 34 dwellings. I am generally pragmatic about development in my ward, but pragmatism does have its limits. Consequently, in my view **a high bar must be set for any further windfall development.**

—

Yatton is built on a narrow ridge within the floodplain - the northern extremity of the Somerset Levels and moors, and Sir - you will no doubt collectively spend a considerable number of hours during this inquiry unpicking the technical detail around flood risk.

Simply put, we should resist residential development on this scale in Flood Zone 3. Residents know this site is criss-crossed with drainage ditches and is frequently waterlogged. The suggestion in the technical note submitted by Rappor Consultants Ltd that the proposed ground raising and embanking of the network of rhyne and ditches would

¹ These are:

- 284 dwellings - Chestnut Park, 3 phases (Bloor Homes). *Completed*
- 37 dwellings - Strawberry Fields (Woodstock Homes). *Completed*
- 154 dwellings - Eaton Park (Curo) *Complete 2024*
- 60 dwellings - Moor Road (Persimmon). *Started May 2024*
- 98 dwellings - Rectory Farm (St Modwen). *Likely start late 2024*

“provide additional [groundwater] storage” should be afforded little credibility. I invite you to observe the evidence provided by the aerial photographs (I have circulated) which show the site swamped by surface water. Persistent waterlogging on this site is the norm during the winter months. It is, after all, a floodplain. Mr Croucher will share with you his lived experience.

I note the Environment Agency (EA) maintains its objection due to increased flood risk to existing properties on the site boundary, which the Rappor document appears to make light of.

I further note that in the Appeal Decision (15th June 2022) for the adjacent Rectory Farm site (Appeal Ref: APP/D0121/W/21/3286677), Inspector Harold Stephens added a condition to the allowed appeal to ensure that “the area of the site within which dwellings are to be developed... shall fall wholly on land that is within Flood Zone 1 of the Council’s Strategic Flood Risk Assessment.” Sir - I hope you will judge this carries significant weight.

Flood Plain remains a hard constraint in the consultation draft NPPF but now includes a climate change aspect with the likelihood of extreme flooding increasing with time due to rapid climate change. Housebuilders need to consider how flood risk is changing over time and development needs to be safe over its lifetime (at least 100 years). The appellant’s suggested mitigations are just estimates and provide a false level of certainty in the context of the unpredictable effects of rapid climate change - including the increased frequency of the kind of biblical rains we have experienced over the past 48 hours.

Building on land at risk of flooding is a risk to new homeowners and compounds the danger to existing homes in the surrounding areas. Rain water that could otherwise be soaked up by green fields instead runs quickly off hard surfaces - as we saw just yesterday on Smallway, on the main road between Yatton and Congresbury, giving me little confidence that the mitigation in place from the two new developments there is fully executed and successful.

Rainfall in our area in the twelve months to January 2024 was 114 percent higher than the long-term average, which equates to a 1 in 10-15 year flooding event.

Here in North Somerset, sea levels are predicted to rise between 0.5 and 1.1 metres by 2100. I know from my role at the council that in February 2022, we were extremely fortunate to avoid a major flood event in North Somerset following the Storm Eunice storm surge. Our sea defences will - we hope - mitigate against rising sea levels but the increasingly intense rainfall we are already experiencing will elevate the risk of flooding.

No doubt in the decades to come in urban areas in flood risk areas or on previously developed land within floodplains could see more houses built on stilts, and even amphibious houses able to float when water levels rise. That is not what we're talking about at this inquiry - a green field site wholly on the flood plain, which does what it is supposed to do. Hold water.

Sir - the appellant's team will I am sure also argue you should give significant positive weight to the offer of up to 50 per cent affordable homes. In fact, only 30 percent of the units will be delivered as 'affordable' as set out in the council's policy CS16. Is it not also expensive to build on a floodplain? My considered view is that the additional attenuation and effort to raise ground levels would impact on what the council and the community get delivered in terms of affordable housing. This may or may not be something that can be tested at this inquiry, but we know the appellant can later plead viability and alter the housing mix.

North Somerset Council is now looking at every conceivable opportunity outside areas of flood risk for potential additional supply - including revisiting sites in my ward - discounted in 2022.

In view of that, I would argue this makes this application more of an outlier; and more incongruous with national planning policy.

Sir - to conclude, I have supported proposals for housing where the scale and location is appropriate. This scheme is categorically not one of them and is completely and utterly flawed. Building here is literally planning for disaster. In my view any development should accord with the development plan, be appropriate in scale and avoid exacerbating the risk of flooding in the future or compromise existing dwellings adjacent to the site, and I respectfully ask that you dismiss the appeal.

Thank you.

Cllr Steve Bridger

Councillor for Yatton ward on North Somerset Council

24 September 2024